



# THE LAMBERT FIRM

A PROFESSIONAL LAW CORPORATION

701 MAGAZINE STREET  
NEW ORLEANS, LA 70130  
WWW.THELAMBERTFIRM.COM

TOLL FREE: 1.800.521.1750  
PHONE: 504.581.1750  
FAX: 504.529.2931

January 31, 2020

**VIA U.S. MAIL**

National FOIA Office  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW (2310A)  
Washington, DC 20460

**Re: FOIA REQUEST in reference to communications between EPA and  
Denka Performance Elastomers, LLC and/or Ramboll Environ**

To Whom It May Concern:

Pursuant to the Freedom of Information Act (FOIA), I am requesting an opportunity to inspect or obtain copies of the items listed below. This request is limited in scope from November 8, 2019 to January 31, 2020.

- Any and all correspondence, communications, and attachments, including, but not limited to, emails, between the EPA and Denka Performance Elastomers, LLC, and/or Ramboll Environ;
- Public records in native format received by the EPA from Ramboll Environ and/or Denka Performance Elastomer LLC regarding the model code and/or underlying data of a physiologically based pharmacokinetic ("PBPK") model for chloroprene;
- Full and complete research reports and any cited documents of PBPK modeling of chloroprene, including, but not limited to, manuscripts, observational data used to calibrate key model parameters (e.g. metabolism rates), and the observed fit(s) of the calibrated model to those data, and raw data exchanged between EPA and Ramboll/Denka regarding PBPK modeling of chloroprene;
- The results, if any, of PBPK model development and peer review, and subsequent EPA evaluation;
- The results, if any, of post-calibration tests of the model where model predictions are compared to observed data that were not used to calibrate the model; and
- Summaries and minutes of any meetings between EPA and Ramboll or Denka regarding PBPK modeling of chloroprene.

Please advise when we should expect to receive production of these records, the method of production and any fees associated with the production. Do not hesitate to contact us with any questions or concerns. If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify us of the appeal procedures available.



Thank you for considering our request.

Sincerely,

  
Hugh P. Lambert, Esq.